

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHIPCO TRANSPORT INC.

Plaintiff,

-against-

JDB INTERNATIONAL INC. and
LAPTON FREIGHT INTERNATIONAL
LIMITED,

Defendants.
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09 cv 7532 (CM)

ECF CASE

DEFENDANT'S NOTICE OF MOTION FOR STAY OF DISCOVERY

Upon the accompanying Memorandum of Law, and pleadings heretofore had herein, Defendant, LAPTON FREIGHT INTERNATIONAL LIMITED (HONG KONG), will move this Court before the Honorable Colleen McMahon, United States Courthouse, 500 Pearl Street, Courtroom 14-C, New York, New York for an order pursuant to Federal Rules of Civil Procedure 26(c) staying discovery pending a decision on Defendant's Motion to Dismiss Plaintiff's Amended Complaint.

November 12, 2010

LAPTON FREIGHT INTERNATIONAL, INC.
(Hong Kong)

By: Anne C. LeVasseur
Patrick F. Lennon (PL2162)
Anne C. LeVasseur (AL3333)
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AFFIRMATION OF SERVICE

I hereby certify that on November 12, 2010, a copy of the foregoing Notice of Motion for Stay of Discovery was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing. Parties may access this filing through the Court's CM/ECF system.

By: Anne C. LeVasseur
Anne C. LeVasseur